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Attorneys for Defendant

FRANKLIN K. MUKAI

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

SPORTS SHINKO CO., LTD., a  
Japanese corporation,

Plaintiff,

vs.

QK HOTEL, LLC, a Hawai`i limited  
liability company, KG HOLDINGS  
LLC, a Hawai`i limited liability  
company, FRANKLIN K. MUKAI,

Defendants.

CIVIL NO. 04-00124 ACK/BMK  
(Consolidated Case)

DEFENDANT FRANKLIN K.  
MUKAI'S **SUBSTANTIVE JOINDER  
IN MOTION FOR PRETRIAL  
CONFERENCE AND TO MODIFY  
STIPULATED PROTECTIVE  
ORDER**, FILED BY KG HOLDINGS,  
LLC ON JANUARY 16, 2007;  
CERTIFICATE OF SERVICE

(No trial date assigned.)

SPORTS SHINKO (USA) CO., LTD.,  
a Delaware corporation,

Plaintiff,

vs.

PUKALANI GOLF CLUB, LLC, a  
Hawai`i limited liability company; KG  
MAUI DEVELOPMENT, LLC, a  
Hawai`i limited liability company; KG  
HOLDINGS, LLC, a Hawai`i limited  
liability company, FRANKLIN K.  
MUKAI,

Defendants.

CIVIL NO. 04-00125 ACK/BMK

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SPORTS SHINKO (USA) CO.,  
LTD., a Delaware corporation,

Plaintiff,

vs.

KIAHUNA GOLF CLUB, LLC, a  
Hawai`i limited liability company;  
KG KAUAI DEVELOPMENT, LLC,  
a Hawai`i limited liability company;  
PUKALANI GOLF CLUB, LLC, a  
Hawai`i limited liability company;  
KG MAUI DEVELOPMENT, LLC, a  
Hawai`i limited liability company;  
MILILANI GOLF CLUB, LLC, a  
Hawai`i limited liability company;  
QK HOTEL, LLC, a Hawai`i limited  
liability company; OR HOTEL, LLC,  
a Hawai`i limited liability company,  
and KG HOLDINGS, LLC, a Hawai`i

CIVIL NO. 04-00126 ACK/BMK

limited liability company, FRANKLIN K. MUKAI,

Defendants.

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SPORTS SHINKO CO., LTD., a Japanese corporation,

Plaintiff,

vs.

OR HOTEL, LLC, a Hawai`i limited liability company, KG HOLDINGS, LLC, a Hawai`i limited liability company, FRANKLIN K. MUKAI,

Defendants.

CIVIL NO. 04-00127 ACK/BMK

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SPORTS SHINKO (USA) CO., LTD., a Delaware corporation,

Plaintiff,

vs.

MILILANI GOLF CLUB, LLC, a Hawai`i limited liability company; KG HOLDINGS LLC, Hawai`i limited liability company, FRANKLIN K. MUKAI,

Defendants.

CIVIL NO. 04-00128 ACK/BMK

**DEFENDANT FRANKLIN K. MUKAI'S SUBSTANTIVE JOINDER IN  
MOTION FOR PRETRIAL CONFERENCE AND TO MODIFY  
STIPULATED PROTECTIVE ORDER, FILED BY KG HOLDINGS, LLC  
ON JANUARY 16, 2007**

Pursuant to LR 7.9, Defendant Franklin K. Mukai hereby substantively joins in Defendant KG Holdings, LLC's MOTION FOR PRETRIAL CONFERENCE AND TO MODIFY STIPULATED PROTECTIVE ORDER, filed on January 16, 2007.

Acknowledging that Mr. Mukai proposed the amended stipulated protective order ("SPO") attached to the aforementioned Motion, Mr. Mukai requests an additional provision therein, to be included as a new Paragraph 2.6 on page 5 of the proposed revised SPO, as follows:

**2.6 insurers for the parties, including attorneys representing such insurers and/or their insureds in connection with the Litigation.**

Mr. Mukai submits that, together with the adjustment of responsibilities both for establishing the grounds for confidentiality of materials produced for discovery and for bearing the substantial expenses associated therewith, the above proposed additional Paragraph 2.6 allows for necessary disclosure of such materials as required in connection with liability insurance implicated by the instant claims.

Defendant KG Holdings, LLC has agreed to the additional language stated above.

DATED: Honolulu, Hawaii, January 17, 2007.

/s/ John Reyes-Burke  
WILLIAM A. BORDNER  
JOHN REYES-BURKE  
Attorneys for Defendant  
FRANKLIN K. MUKAI

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

SPORTS SHINKO CO., LTD., a  
Japanese corporation,

Plaintiff,

vs.

QK HOTEL, LLC, a Hawai`i limited  
liability company, KG HOLDINGS  
LLC, a Hawai`i limited liability  
company, FRANKLIN K. MUKAI,

Defendants.

CIVIL NO. 04-00124 ACK/BMK  
(Consolidated Case)

CERTIFICATE OF SERVICE

(No trial date assigned.)

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FRANKLIN K. MUKAI,

Third-Party  
Plaintiff,

vs.

SPORTS SHINKO (USA) CO.;  
LTD., a Delaware corporation;  
SPORTS SHINKO (HAWAII) CO.,  
LTD., a Hawai`i corporation;  
SPORTS SHINKO (MILILANI) CO.,  
LTD., a Hawai`i corporation;  
SPORTS SHINKO (KAUAI) CO.,  
LTD., a Hawai`i corporation;  
SPORTS SHINKO (PUKALANI)  
CO., LTD., a Hawai`i corporation;  
SPORTS SHINKO RESORT  
HOTEL CORPORATION, a  
Hawai`i corporation; SPORTS

SHINKO (WAIKIKI)  
CORPORATION, a Hawai`i  
corporation; and OCEAN RESORT  
HOTEL CORPORATION, a  
Hawai`i corporation,

Third-Party  
Defendants.

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SPORTS SHINKO (USA) CO., LTD.,  
a Delaware corporation,

Plaintiff,

vs.

PUKALANI GOLF CLUB, LLC, a  
Hawai`i limited liability company; KG  
MAUI DEVELOPMENT, LLC, a  
Hawai`i limited liability company; KG  
HOLDINGS, LLC, a Hawai`i limited  
liability company, FRANKLIN K.  
MUKAI,

Defendants.

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FRANKLIN K. MUKAI,

Third-Party  
Plaintiff,

vs.

SPORTS SHINKO CO., LTD., a  
Japan corporation, SPORTS  
SHINKO (HAWAII) CO., LTD., a  
Hawai`i corporation, SPORTS  
SHINKO (MILILANI) CO., LTD., a

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Hawai`i corporation, SPORTS SHINKO (KAUAI) CO., LTD., a Hawai`i corporation, SPORTS SHINKO (PUKALANI) CO., LTD., a Hawai`i corporation, SPORTS SHINKO RESORT HOTEL CORPORATION, a Hawai`i corporation, SPORTS SHINKO (WAIKIKI) CORPORATION, a Hawai`i corporation, and OCEAN RESORT HOTEL CORPORATION, a Hawai`i corporation,

Third-Party  
Defendants.

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SPORTS SHINKO (USA) CO., LTD., a Delaware corporation,

Plaintiff,

vs.

KIAHUNA GOLF CLUB, LLC, a Hawai`i limited liability company;  
KG KAUAI DEVELOPMENT, LLC, a Hawai`i limited liability company;  
PUKALANI GOLF CLUB, LLC, a Hawai`i limited liability company;  
KG MAUI DEVELOPMENT, LLC, a Hawai`i limited liability company;  
MILILANI GOLF CLUB, LLC, a Hawai`i limited liability company;  
QK HOTEL, LLC, a Hawai`i limited liability company; OR HOTEL, LLC,

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a Hawai'i limited liability company,  
and KG HOLDINGS, LLC, a Hawai'i  
limited liability company, FRANKLIN  
K. MUKAI,

Defendants.

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FRANKLIN K. MUKAI,

Third-Party  
Plaintiff,

vs.

SPORTS SHINKO CO., LTD., a  
Japan corporation, SPORTS  
SHINKO (HAWAII) CO., LTD., a  
Hawai'i corporation, SPORTS  
SHINKO (MILILANI) CO., LTD., a  
Hawai'i corporation, SPORTS  
SHINKO (KAUAI) CO., LTD., a  
Hawai'i corporation, SPORTS  
SHINKO (PUKALANI) CO., LTD., a  
Hawai'i corporation, SPORTS  
SHINKO RESORT HOTEL  
CORPORATION, a Hawai'i  
corporation, SPORTS SHINKO  
(WAIKIKI) CORPORATION, a  
Hawai'i corporation, and OCEAN  
RESORT HOTEL  
CORPORATION, a Hawai'i  
corporation,

Third-Party  
Defendants.

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SPORTS SHINKO CO., LTD., a  
Japanese corporation,

CIVIL NO. 04-00127 ACK/BMK

Plaintiff,

vs.

OR HOTEL, LLC, a Hawai`i limited liability company, KG HOLDINGS, LLC, a Hawai`i limited liability company, FRANKLIN K. MUKAI,

Defendants.

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FRANKLIN K. MUKAI,

Third-Party  
Plaintiff,

vs.

SPORTS SHINKO (USA) CO.; LTD., a Delaware corporation; SPORTS SHINKO (HAWAII) CO., LTD., a Hawai`i corporation; SPORTS SHINKO (MILILANI) CO., LTD., a Hawai`i corporation; SPORTS SHINKO (KAUAI) CO., LTD., a Hawai`i corporation; SPORTS SHINKO (PUKALANI) CO., LTD., a Hawai`i corporation; SPORTS SHINKO RESORT HOTEL CORPORATION, a Hawai`i corporation; SPORTS SHINKO (WAIKIKI) CORPORATION, a Hawai`i corporation; and OCEAN RESORT HOTEL CORPORATION, a Hawai`i corporation,

Third-Party

Defendants.

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SPORTS SHINKO (USA) CO., LTD.,  
a Delaware corporation,

Plaintiff,

vs.

MILILANI GOLF CLUB, LLC, a  
Hawai`i limited liability company; KG  
HOLDINGS LLC, Hawai`i limited  
liability company, FRANKLIN K.  
MUKAI,

Defendants.

CIVIL NO. 04-00128 ACK/BMK

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FRANKLIN K. MUKAI,

Third-Party  
Plaintiff,

vs.

SPORTS SHINKO CO., LTD., a  
Japan corporation, SPORTS  
SHINKO (HAWAII) CO., LTD., a  
Hawai`i corporation, SPORTS  
SHINKO (MILILANI) CO., LTD., a  
Hawai`i corporation, SPORTS  
SHINKO (KAUAI) CO., LTD., a  
Hawai`i corporation, SPORTS  
SHINKO (PUKALANI) CO., LTD., a  
Hawai`i corporation, SPORTS  
SHINKO RESORT HOTEL  
CORPORATION, a Hawai`i

corporation, SPORTS SHINKO  
(WAIKIKI) CORPORATION, a  
Hawai`i corporation, and OCEAN  
RESORT HOTEL  
CORPORATION, a Hawai`i  
corporation,

Third-Party  
Defendants.

### CERTIFICATE OF SERVICE

I hereby certify that, on the dates and by the methods of service noted below, a true and correct copy of the foregoing was served on the following at their last known address:

Served electronically through CM/ECF:

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KG MAUI DEVELOPMENT, LLC;  
KIAHUNA GOLF CLUB, LLC;  
MILILANI GOLF CLUB, LLC  
OR HOTEL, LLC;  
PUKALANI GOLF CLUB, LLC  
PUKALANI GOLF CLUB, LLC;  
and QK HOTEL, LLC

DATED: Honolulu, Hawaii, January 17, 2007.

/s/ John Reyes-Burke

WILLIAM A. BORDNER  
JOHN REYES-BURKE  
Attorneys for Defendant  
and Third-Party Plaintiff  
FRANKLIN K. MUKAI